

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

WILLIAM JAMESON	:	CIVIL ACTION
	:	
v.	:	NO. 02-2802
	:	
JOHN J. RIGAS, MICHAEL J. RIGAS, TIMOTHY J. RIGAS, and JAMES P. RIGAS	:	
	:	
ERNEST PEDATA	:	CIVIL ACTION
	:	
v.	:	NO. 02-2901
	:	
JOHN J. RIGAS, MICHAEL J. RIGAS, TIMOTHY J. RIGAS, and JAMES P. RIGAS	:	
	:	
DAVID SORENSON	:	CIVIL ACTION
	:	
v.	:	NO. 02-3158
	:	
JOHN J. RIGAS, MICHAEL J. RIGAS, TIMOTHY J. RIGAS, and JAMES P. RIGAS	:	
	:	
HAROLD WEINER	:	CIVIL ACTION
	:	
v.	:	NO. 02-3211
	:	
JOHN J. RIGAS, MICHAEL J. RIGAS, TIMOTHY J. RIGAS, and JAMES P. RIGAS	:	
	:	
BRIAN SMITH	:	CIVIL ACTION
	:	
v.	:	NO. 02-3625
	:	
JOHN J. RIGAS, MICHAEL J. RIGAS, TIMOTHY J. RIGAS, and JAMES P. RIGAS	:	
	:	

KURT MEYLE : CIVIL ACTION

V. : NO. 02-3699

**JOHN J. RIGAS, MICHAEL J. RIGAS,
TIMOTHY J. RIGAS, and JAMES P. RIGAS**

JEFFREY J. HYSLIP

V. : NO. 02-3768

**JOHN J. RIGAS, MICHAEL J. RIGAS,
TIMOTHY J. RIGAS, and JAMES P. RIGAS**

SCOTT BURNSIDE

V. : NO. 02-3769

**JOHN J. RIGAS, MICHAEL J. RIGAS,
TIMOTHY J. RIGAS, and JAMES P. RIGAS**

WILLIAM SPADA

v. : NO. 02-3858

**JOHN J. RIGAS, MICHAEL J. RIGAS,
TIMOTHY J. RIGAS, and JAMES P. RIGAS**

**DECLARATION OF DEBORAH R. GROSS IN SUPPORT OF THE
MOTION OF INTERNATIONAL BROTHERHOOD OF TEAMSTERS, LOCAL 705
PENSION FUND FOR CONSOLIDATION, APPOINTMENT
AS LEAD PLAINTIFF, AND FOR APPROVAL
OF SELECTION OF LEAD AND LIAISON COUNSEL**

Deborah R. Gross, declares, under penalty of perjury:

1. I am with the law firm of Law Offices Bernard M. Gross, P.C. ("Law Offices Bernard M. Gross, P.C."), one of plaintiff's counsel in the action entitled William Jameson v. John J. Rigas, et al., No. 02-CV-2802 (the "Jameson Action"). I submit this Declaration in support of the motion of International Brotherhood of Teamsters, Local 705 Pension Fund ("Local 705") for consolidation, appointment as Lead Plaintiff and for approval of selection of Lead and Liaison Counsel.
2. Attached hereto as Exhibit A is a true and accurate copy of the complaint filed in the Jameson Action. Attached to the complaint is a true and accurate copy of the certification which demonstrates plaintiff's class standing and requisite financial interest in the outcome of this litigation.
3. Attached hereto as Exhibit B is a true and accurate copy of the notice published by plaintiff in the Jameson Action on the Business Wire, a national, business-oriented newswire service, on May 10, 2002.
4. Attached hereto as Exhibit C is a true and accurate copy of a loss chart presenting the transactions in the subject securities and summarizing the estimated losses of Local 705 at \$282,781.00 in connection with its purchases of shares of Adelphia Business Solutions.
5. Attached hereto as Exhibit D is the certification of Local 705.
6. Attached hereto as Exhibit E is a true copy of the firm resume of Milberg Weiss Bershad Hynes & Lerach LLP.

7. Attached hereto as Exhibit F is a true copy of the firm resume of Law Offices Bernard M. Gross, P.C.

Dated: July 9, 2002

Deborah R. Gross